CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

ORDER NO. 95-114

SITE CLEANUP REQUIREMENTS FOR:

RICHARD KLINGER, AND
THERMOFUSION, INCORPORATED

for the property located at

2342 AMERICAN AVENUE
HAYWARD, ALAMEDA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter called the Board) finds that:

1. **Site Description**: ThermoFusion Incorporated, ("ThermoFusion"), operates a manufacturing facility located at 2342 American Avenue, Hayward, Alameda County, ("Site"). The Site, as shown in the site map attached to this Order, is bordered by American Avenue to the north, and several light industrial facilities to the east, south and west. A domestic well is located about 200 feet away from the southwestern corner of the Site. In addition, a variety of wells tapping differing aquifer strata for different purposes are present within a one-mile radius of the Site. A concrete lined drainage ditch is about 250 feet away from the southwestern corner of the Site. According to the Alameda County Public Works' record, the drainage ditch is named "Line A" which becomes unlined and finally discharges in an unnamed creek in the Hayward Landing area.

2. **Site History**: ThermoFusion has manufactured precision materials and heat treated and brazed materials for the aerospace industry since 1973. The manufacturing operation has used a number of industrial solvents including Trichloroethylene (TCE), 1,1,1-Trichloroethane (TCA), Tetrachloroethylene (PCE) and Acetone for degreasing of metal parts and cleansing of equipment. Motor oil for machinery and quenched oil from the heat treatment process were also handled on Site as a part of facility operation. A 500-gallon exterior aboveground storage tank was used to store TCE up to about 1988. On several occasions, minor TCE and TCA spillage and leakage have reportedly occurred since the manufacturing operation commenced on Site. Additionally, an accidental release of a substantial amount of TCE from the aboveground tank reportedly occurred at some point during ThermoFusion's occupancy, but the evidence obtained by the Board staff so far is inconclusive with respect to the actual time of occurrence of the release.

3. **Property and Business Ownerships**: Richard D. Klinger, ("Klinger") was the original owner and operator of ThermoFusion until January 14, 1983 when all ThermoFusion stock was sold to Richard Penrose ("Penrose"). Penrose is the current owner and the President of ThermoFusion. Klinger has been and continues to be the owner of the property. ThermoFusion has leased and continues to lease the property from Klinger since the date the ThermoFusion was purchased by Penrose.

4. **Klinger's Bankruptcy and Proposed Plan of Reorganization**: On April 26, 1994, Richard and Peggy Klinger filed a petition under Chapter 11 of Bankruptcy Code at the U.S. Bankruptcy Court, Northern District of California. On August 30, 1994, the State Attorney General Office filed a Proof of Environmental Claim on behalf of the Board against the Klingers at the U.S. Bankruptcy Court, Northern District of California. The Klingers and Thermofusion have reached agreement on a proposed Plan of Reorganization under which money for investigation and remediation of contamination at the site will be contributed by both Thermofusion and Klinger and is to be administered by a Plan Administrator. After confirmation of the Plan, the Plan Administrator will serve as the primary coordinator between the Board and the dischargers to ensure that all activities associated with the site investigation and remediation are in compliance with this Order. Should the Plan Administrator fail to fulfill the Order requirements, the Board will notify the dischargers and request them to implement immediate corrective measures to ensure their full compliance with the Order.

5. **Occurrence of Groundwater**: Regionally the Site is located near the San Francisco Bay fringe, west of the East Bay Hills and within the San Lorenzo Cone water producing area.

   The local geology is summarized in a March 11, 1994, Soil and Groundwater Investigation Report (by Gen-Tech Environmental). According to this report, the Site is underlain by stream and floodplain alluvial sediment, interbedded with silty clay, silts and sands to the depths explored. A silty clay strata occurs from the surface to depths of about 10 feet. A water bearing layer (the "A" zone) at depths of about 10 to 14 feet is composed of sandy silt and silty sand interbedded with clay. Underlaying this thin water bearing zone is a clay strata (the "A-aquitard") at depths of about 14 to 25 feet. This clay strata appears to be stratigraphically continuous. A second water bearing layer (the "B-zone") composed of sand and gravel with local, discontinuous thin clay beds underlies the clay strata at about 25 feet bgs. Another clay layer (the "B-aquitard") underlies the second water bearing zone below 31 to 33 feet. The thickness of the B-aquitard has not been fully explored.

   Groundwater is reported occurring at about 10 to 12 feet below ground surface (bgs) in the uppermost water bearing zone. The groundwater flow direction in both water bearing zones is southwesterly.

6. **Soil and Groundwater Investigations**: During a routine compliance inspection in mid-1990, Hayward Fire Department staff noted dark staining on the ground at the rear of the

property. The Fire Department subsequently requested ThermoFusion to investigate the staining. The result of this initial soil and groundwater investigation by Streamborn for ThermoFusion indicated that as high as 4,900 mg/kg and 4,000 mg/kg TCE and oil, respectively, were found in soil samples collected at about 9 feet below grade. There were 190 mg/kg of PCE and low levels of 1,1,1-TCA found in soil samples at greater depths. Soil gas samples collected during piezometer installations detected as high as 1,400 ppm (v/v) TCE from a soil depth about 3 to 6 feet bgs. Additionally, as high as 71,000 ppb and 25,000 ppb of TCE and 1,1,1-TCA, respectively, were detected in groundwater samples collected during that investigation. Other chemical compounds found in groundwater below the Site included PCE at 310 ppb, 1,1-DCA at 580 ppb, Methylene Chloride at 210 ppb, 1,1-DCE at 120 ppb, 1,2-DCA at 37 ppb, t-1,2-DCE at 45 ppb, and oil and grease at 4,700 ppb. Based on this data ThermoFusion demanded Klinger to complete site investigation and remediation.

Without completing the definition of the vertical and horizontal extent of soil and groundwater pollution, Klinger commenced soil excavation in mid-1991. It was reported that a total of about 1,400 cubic yards of soil contaminated with total volatile organic compounds (VOCs) exceeding 1 mg/kg had been excavated and removed for off-site disposal. Although some soil samplings were reportedly conducted before and after the excavation, neither the sampling work plan nor the excavation report was submitted to the Board.

On February 8, 1993, a work plan was submitted by Klinger proposing additional soil and groundwater investigation for on- and off-Site conditions. Although the work plan was approved by the Board staff on April 5, 1993, the work was delayed due to difficulty encountered in securing access permission from the neighboring properties. With Board staff assistance, off-site access was finally granted by the neighboring properties and the field work was commenced in November of 1993. The result of this investigation found that over 15,000 ppb TCE was detected in a groundwater sample collected from a downgradient off-Site monitoring well installed in the A-zone. The range of TCE concentrations detected in groundwater samples collected from three B-zone wells was 2.8 to 3,700 ppb. Additionally, high levels of TCA and daughter compounds of TCE were found in the A-zone. The groundwater plumes were found to be migrating southwesterly toward the unnamed concrete lined drainage ditch. The horizontal and vertical extent of the groundwater plumes and soil pollution have not yet been fully defined.

Based on the investigation, Board staff believes that the previous use and storage of TCE for the Thermofusion production process and/or the accidental release have contributed to the soil and groundwater pollution. The Board staff requested Klinger to conduct further soil and groundwater investigation in a letter of June 8, 1994. To date, the Board staff has not received any work plan from Klinger pursuant to this request. However, the Creditors in Klinger's bankruptcy proceeding have recently proposed a plan delineating the strategy for Site investigation and remediation.

7. **Groundwater Pollution**: ThermoFusion's operation has caused or permitted, and the dischargers (as described below) threaten to cause or permit, waste to be discharged or deposited where it is or probably will be discharged to waters of the State and creates or threatens to create a condition of pollution or nuisance.

8. **Named Dischargers**: Based on the findings set forth above, ThermoFusion and Klinger are both dischargers as the term is used in Water Code section 13304, and remain subject to state and federal laws regulating water pollution and hazardous substances notwithstanding the Klinger bankruptcy. A Plan of Reorganization has been proposed by ThermoFusion in the Klinger bankruptcy action which provides for the appointment of a Plan Administrator, who will be responsible for the administration of the Plan of Reorganization, including the implementation of a Cleanup Plan to investigate and remediate contamination at the Site. If a Plan of Reorganization is confirmed by the Bankruptcy Court which provides for implementation of a Cleanup Plan which is consistent with the terms of this Order, then under the Court's order confirming the Klingers' bankruptcy reorganization, the primary responsibility for compliance with the terms of this Order will lie with the Plan Administrator. In that event, compliance by the Plan Administrator with the terms of the Plan of Reorganization will constitute substantial compliance with this Order. Consequently, the named dischargers will be responsible for complying with the terms of this Order only in the event the Plan Administrator fails to so comply.

9. **Scope of This Order**: This Order contains tasks for completion of soil and groundwater characterization at the Site; implementation and evaluation of the interim remedial actions for on- and off-site soil and groundwater pollution attributable to the dischargers, and evaluation and implementation of final cleanup actions. The tasks are necessary to alleviate the threat to surface and groundwater posed by the migration of contaminants and to provide a substantive technical basis for designing and evaluating the effectiveness of final remediation.

10. **Basin Plan**: The Board adopted a revised Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) on December 17, 1986. The Board has amended the Basin Plan several times since then. The Basin Plan and its amendments contain water quality objectives and beneficial uses for waters of the State, including surface waters and groundwaters.

11. **Beneficial Uses - Groundwater**: The present and potential beneficial uses of groundwater underlying and adjacent to the Site include:

    a. Municipal and domestic water supply
    b. Industrial process water supply
    c. Industrial service water supply
    d. Agricultural water supply

12. **Beneficial Uses - Surface Water**: The beneficial uses of San Francisco Bay and contiguous surface waters in the vicinity of the Site include:

    a. Contact and non-contact water recreation
    b. Wildlife habitat
    c. Warm fresh water habitat
    d. Fish migration and spawning
    e. Preservation of endangered species
    f. Industrial process supply or service supply

13. **Cost Recovery**: Pursuant to California Water Code Section 13304, the dischargers are hereby notified that the Board is entitled to, and may seek reimbursement for, all reasonable costs actually incurred by the Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this order.

14. **CEQA**: This action is an Order to enforce the laws and regulations administered by the Board. This action is categorically exempt from the provisions of CEQA pursuant to Section 15321 of the Resources Agency Guidelines.

15. **Notification**: The Board has notified the dischargers and all interested agencies and persons of its intent under California Water Code Section 13304 to prescribe site cleanup requirements for the discharge, and has provided them with an opportunity to submit their written comments.

16. **Public Hearing**: The Board, at a public meeting, heard and considered all comments pertaining to this discharge.

THEREFORE, IT IS HEREBY ORDERED, pursuant to Section 13304 of the California Water Code, that the named dischargers, comply with this Order to clean up and abate the effects described in the above findings, as follows:

A. PROHIBITIONS

1. The discharge of wastes or hazardous materials in a manner which will significantly degrade, or threaten to degrade, water quality or adversely affect, or threaten to adversely affect, the beneficial uses of the waters of the State is prohibited.

2. Further migration of pollutants through subsurface transport to waters of the State is prohibited.

3. Activities associated with the subsurface investigation and cleanup, that will cause significant adverse migration of pollutants, are prohibited.

4. The handling, treatment, storage or disposal of soil or groundwater containing pollutants shall not create a nuisance as defined in Section 13050 (m) of the California Water Code.

B. SPECIFICATIONS

1. **Interim Remedial Activities**: As an interim measure to prevent further off-site migration of the groundwater pollution, the Plan Administrator shall implement the proposed interim remedial actions upon approval by the Executive Officer prior to commencement of such work; and conduct monitoring and investigative activities reasonably necessary to define the current local hydrogeologic conditions, and the lateral and vertical extent of soil and groundwater pollution. Should monitoring results show evidence of pollutant migration, additional characterization of pollutant extent may be required.

2. **Potential Conduits**: All wells identified as potential conduits for the migration of pollutants attributable to the dischargers shall be properly abandoned, to the extent legally possible. A detailed work plan shall be submitted to the Board for review and approval which describes the proposed methods of abandonment for each well identified.

3. **Cleanup Goals - Soils**: The cleanup goals for source area soils are defined as follows. For total VOCs the residual soil concentration shall be no greater than 1 mg/kg. Alternate soil cleanup goals may be proposed based on Site specific data. If higher levels of pollutants are proposed to be left in soils, it must be demonstrated that the aforementioned cleanup goal is not feasible, that alternate levels will not threaten the quality of waters of the State, and that human health and the environment are protected. Final cleanup goals for source-area soils must be acceptable to the Executive Officer. If any significant concentrations of chemicals are left in the soil, follow-up groundwater monitoring will be required.

4. **Cleanup Goals - Groundwater**: Final cleanup goals for polluted groundwater, including sources of drinking water, on- and off-Site, shall be background water quality if feasible, in accordance with the State Water Resources Control Board's Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters in California". If background water quality goals are not achievable, as determined by valid data, alternative cleanup goals may be proposed but must be approved by the Board. Alternate goals may include applicable standards, such as Maximum Contaminant Levels, and shall be based on an evaluation of the cost, effectiveness and a risk assessment to determine the effects on human health and the environment. These goals shall reduce the mobility, toxicity, and volume of pollutants.

5. **Reclamation**: If groundwater extraction and treatment is considered as a final

alternative, the feasibility of water reuse, and disposal to the sanitary sewer must be evaluated. Based on the Regional Board Resolution 88-160, good faith efforts shall be used to optimize, with a goal of 100 per cent reclamation or reuse of groundwater extracted as a result of cleanup activities. The Plan Administrator and the dischargers shall not be found in violation of this Order if documented factors beyond the Plan Administrator's or the dischargers's control prevent attainment of this goal, provided the Plan Administrator or the dischargers has made a good faith effort to attain this goal. If reuse is part of a proposed alternative, an application for Waste Discharge Requirements may be required. If discharge to waters of the State is part of a proposed alternative, a NPDES permit application must be completed and submitted, and must include the evaluation of the feasibility of water reuse and disposal to the sanitary sewer.

C. TASKS

1. The Plan Administrator (or, if the Plan Administrator fails to perform, then the dischargers) shall perform all investigation and cleanup work in accordance with the requirements of this Order. All technical reports submitted in compliance with this Order shall be acceptable to the Executive Officer, and, if necessary, additional information shall be submitted.

2. To comply with all of the Prohibitions, Specifications, Tasks, and Provisions of this Order, the following task and time schedule shall be met::

a. **QUARTERLY MONITORING WORK PLAN**

COMPLETION DATE: August 5, 1995

Submit a work plan, acceptable to the Executive Officer, which proposes a groundwater monitoring program. The proposal shall include a time schedule for the implementation of monitoring of groundwater quality on- and off-Site, the types of groundwater analysis, the sampling protocol, procedure and frequency.

b. **SOIL AND GROUNDWATER REMEDIAL INVESTIGATION WORK PLAN**

COMPLETION DATE: August 20, 1995

Submit a work plan, acceptable to the Executive Officer, which proposes the scope and implementation schedule for characterizing the source, nature, and extent of pollution on- and off-Site. The proposed remedial investigation shall identify all potential conduits on- and in the vicinity of the Site, and provide necessary and sufficient information about the lateral and vertical extent of the soil and groundwater pollution for the purpose of completing the subsequent feasibility

study. It is anticipated that remedial investigation activities will be conducted in phases. A report summarizing the result of work shall be submitted within 45 days upon completion of each phase of remedial investigation..

c. **PHASE ONE REMEDIAL INVESTIGATION**

COMPLETION DATE: November 5, 1995

Submit a technical report, acceptable to the Executive Officer, summarizing the result of the Phase I remedial investigation which includes a cone-penetrometer/ hydropunch survey for defining the extent of off-Site pollution in shallow and deeper groundwater zones.

d. **IMPLEMENTATION OF INTERIM REMEDIAL MEASURES**

COMPLETION DATE: June 30, 1996

Submit a technical report, acceptable to the Executive Officer, documenting the implementation of the interim groundwater remedial measure. The documentation includes but is not limited to the actual design of the selected remedy, equipment procurement, construction, installation, start up and permitting.

e. **EVALUATION OF POTENTIAL CONDUITS**

COMPLETION DATE: July 31, 1996

Submit a technical report, acceptable to the Executive Officer, which contains the results of a potential conduit study. A potential conduit is a man-made structure or facility which may allow pollutants to migrate from the ground surface to groundwater, and/or between water bearing zones. These include but are not limited to existing monitoring wells, extractions wells, buried pipelines, trenches, and sumps as well as historical drainage or water wells in the vicinity of the soil or groundwater pollution.

f. **CLOSURE OF POTENTIAL CONDUITS**

COMPLETION DATE: September 15, 1996

Submit a technical report, acceptable to the Executive Officer, which documents the closing of any potential conduits as identified in Provision C.2.b. This report should include documentation of the appropriate permits, types and quantities of materials used to seal each conduit, and the method of destruction, as well as a description of the water bearing zones which were sealed.

h. **FEASIBILITY STUDY AND FINAL ASSESSMENT OF REMEDIATION PERFORMANCE**

COMPLETION DATE: 180 days after completion of remedial investigation

Submit a technical report, acceptable to the Executive Officer, which comprises two parts.

ii) Part I shall document the assessment of the effectiveness of the interim groundwater remediation. Assessment shall be based on several criteria including but not limited to chemical mass removal, capture zone analysis, groundwater monitoring results, hydrogeologic interpretation, and applicable cleanup goals. It shall include the description of any system modifications required for efficiency improvement: and

ii) Part II shall include a development of a range of final soil and groundwater remedial alternatives based on the analysis and interpretation of previously collected data, and information about the contamination at site. This evaluation shall consider the guidance provided by Subpart F of the National Oil and Hazardous Substances Pollution Contingency Plan(40 CFR Part 300), CERCLA guidance documents with respect to remedial investigation and feasibility studies, Health and Safety Code Section 25356.1(c), and State Board Resolution No. 92-49, as amended. An implementation schedule shall also be included for the proposed final soil and groundwater remediation

i. **IMPLEMENTATION OF FINAL REMEDIAL ALTERNATIVE ENHANCEMENTS**

COMPLETION DATE: 180 after approval of the report mentioned in C.2.h above or a proposed schedule acceptable to the Executive Officer

Submit a technical report, acceptable to the Executive Officer, documenting completion of any changes to the preferred remediation as recommended in Provision C.2.h. The report shall include but is not limited to engineering design, equipment procurement, construction and installation, start-up and permitting.

3. On an annual basis, for the previous calendar year, by the last day of the second month following the calendar year, the dischargers shall submit an annual technical report, acceptable to the Executive Officer, which shall document and evaluate the progress of remedial actions. The first of annual report is due on February 28, 1996. The report shall contain, but not be limited to, following information:

   a. the volume of groundwater pumped and treated (if applicable) and where the waters were discharged;

b. problems encountered in the past year with implemented and/or proposed solutions;

c. a summary of work completed in the preceding year and projected cleanup activities for the coming year;

d. appropriately scaled maps showing the locations of the Site, all monitoring wells, extraction wells, source areas, existing structures and neighboring properties;

e. a summary of all quality control/quality assurance problems, if any;

f. updated groundwater potentiometric maps showing prevailing groundwater gradients in all concerned water bearing zones;

g. tabulated well construction data, groundwater levels, all groundwater quality data accompanied by a written evaluation of trends in the data, and updated iso-concentration maps for key pollutants in all concerned water bearing zones;

i. updated geologic cross-sections if new information has changed interpretations; and

j. copies of original water sample field data sheets, chains of custody, laboratory data sheets accompanied with any explanation notes for abnormality found in analysis work undertaken during reporting period.

4. On a monthly basis, the dischargers shall submit a letter report documenting the site investigation and remediation work completed in the preceding month and work to be completed in the following month. The monthly reports shall be submitted by the fifth day of each month.

D. PROVISIONS

1. All hydrogeologic reports, documents, plans and specifications shall be certified by and stamped with the seal of an appropriate professional as specified in Section 13273(b) of the California Water Code.

2. Each remedial investigation reports should summarize the results of the work, consolidate data collected from all previous investigation activities, and provide interpretation and conclusion(s) regarding all investigative areas and levels of pollution in soil and groundwater (shallow and deeper aquifers).

3 If the Plan Administrator is delayed, interrupted or prevented from meeting one

or more of the completion dates specified in this Order, the Executive Officer shall be promptly notified by the Plan Administrator and the Board may consider revision to this Order.

4. All samples shall be analyzed using approved EPA methods by State certified laboratories accepted by the Board. All laboratories shall maintain quality assurance/quality control records for Board review.

5. All facilities or control systems installed to achieve compliance with the requirements of this Order shall be maintained in good working order and operated as efficiently as reasonably possible.

6. Copies of all correspondence, reports, and documents pertaining to compliance with the Prohibitions, Specifications, Tasks, and Provisions of this Order, shall be provided to the following agencies:

   a. Hayward Fire Department
   b. Alameda County Environmental Health Department

7.. The Board or its authorized representative, in accordance with Section 13267(c) of the California Water Code, shall be permitted:

   a. Entry upon premises in which any pollution sources exist, or may potentially exist, or in which any required records are kept, which are relevant to this Order.

   b. Access to copy any records required to be kept under the terms and conditions of this Order.

   c. Inspection of any monitoring equipment or methodology implemented in response to this Order.

   d. Sampling of any groundwater or soil which is accessible, or may become accessible, as part of any investigation or remedial action program undertaken pursuant to this Order.

8 The dischargers shall file a report with the Board at least 30 days in advance of any changes in Site occupancy and ownership associated with the facility described by the dischargers.

9. If any hazardous substance is discharged in or on any waters of the State, or discharged and deposited where it is, or probably will be discharged in or on any waters of the State, the Plan Administrator and the dischargers whoever aware of such incident shall report such discharge to this Regional Board, at (510) 286-1255

on weekdays during office hours from 8 a.m. to 5 p.m., and to the Office of Emergency Services at 1-800-852-7550 during non-business hours. A written report shall be filed with the Regional Board within five (5) working days and shall contain information relative to the nature of waste or pollutant, quantity involved, duration of the incident, cause of spill, Spill Prevention, Control and Countermeasures Plan (SPCC) in effect, if any, estimated size of affected area, nature of effects, corrective measures that have been taken or planned, and a schedule of these activities, and person/agencies notified.

10. The Executive Officer will review this Order periodically and revise the requirements as necessary to effectuate the intent of this Order in a prompt and reasonable manner.

11. If further enforcement is needed, the Plan Administrator, to the extent assets are available from the Bankruptcy Estate, or the dischargers shall be liable, pursuant to Section 13304 of the Water Code, to the Board for all reasonable costs actually incurred by the Regional Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this Order. If the Site addressed by this Order is enrolled in a State Board-managed reimbursement program, reimbursement shall be made pursuant to this Order and according to the procedures established in that program. Any disputes raised over reimbursement amounts or methods used in that program shall be consistent with the dispute resolution procedures for that program.

12. Pursuant to California Water Code Sections 13304, 13305, 13350, 13385, 13386, and 13387:

a) if the Plan Administrator fails to comply with this Order or any subsequent amendments, the Executive Officer may request the Attorney General to take appropriate enforcement against the assets held by the Plan Administrator under the Plan. However, it is acknowledged and agreed that the Plan Administrator will be liable for its acts pursuant to this Order or its failure to discharge its obligations under this Order, only to the extent of the assets held by the Plan Administrator pursuant to the plan of reorganization in the Klinger bankruptcy, and the Plan Administrator shall have no personal liability for any violation of this Order except to the extent of the willful misconduct of the Plan Administrator; and

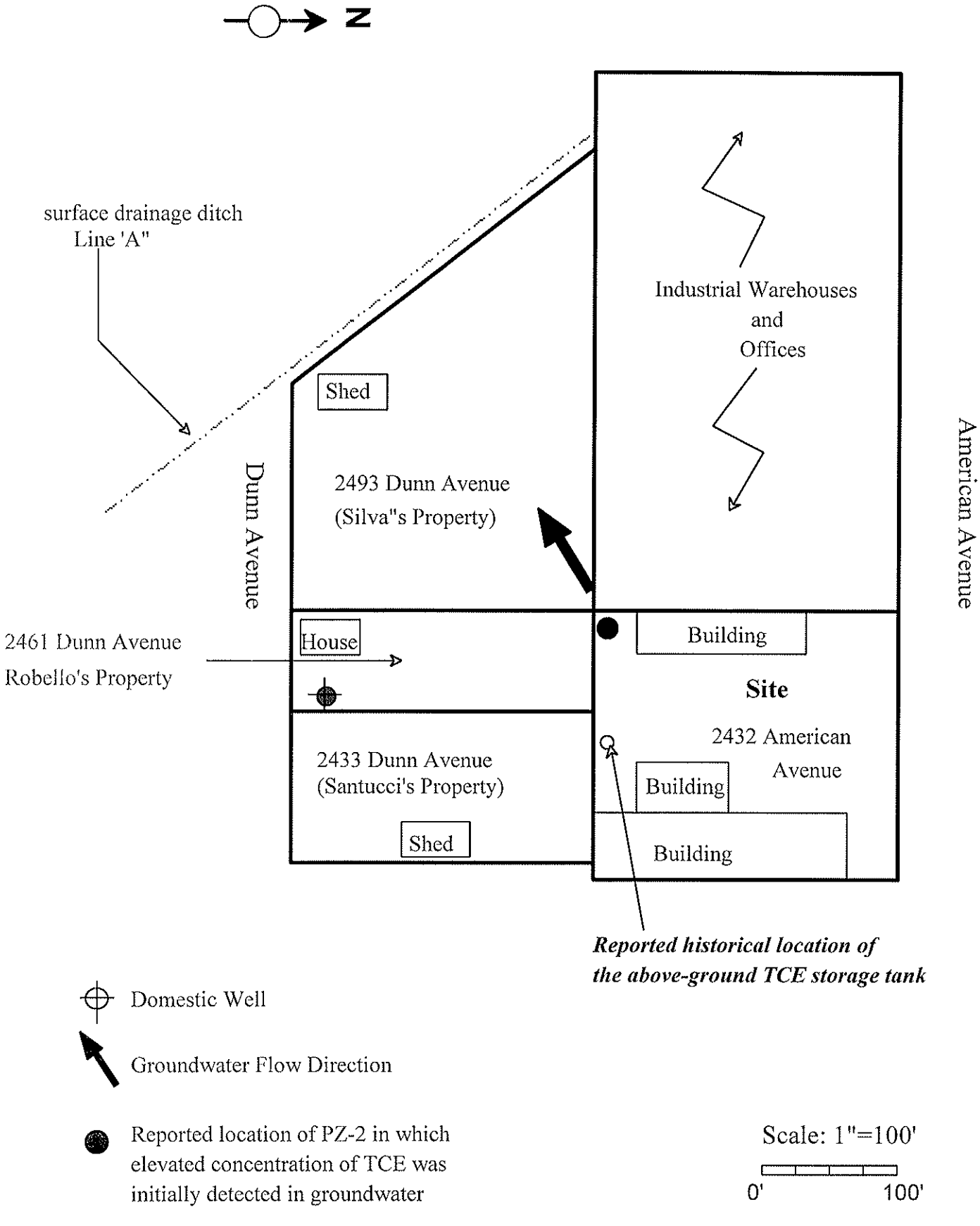
b) in the event of a failure by the Plan Administrator to comply with the terms of this Order or if a discharger fails to comply with this Order or any subsequent amendments, the Executive Officer may request the Attorney General to take appropriate enforcement action against the discharger, including injunctive relief. The Board may schedule a hearing to consider requesting the Attorney General to take appropriate enforcement action against the discharger who has violated this

Order, including injunctive and civil monetary remedies; or the Board may schedule a hearing to administratively impose civil liability not to exceed five thousand dollars ($5,000) for each day this Order is violated.

I, Steven R. Ritchie, Executive Officer, hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on May 24, 1995.

Lawrence P. Kolb
for
Steven R. Ritchie
Executive Officer

Attachments: Site Map



Site Map for 2342 American Avenue, Hayward